

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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SAWABEH INFORMATION SERVICES	:	
COMPANY and EDCOMM, INC.,	:	
	:	
Plaintiffs,	:	Case No.: 11 CV 4164 (SAS)
	:	
v.	:	<u>DECLARATION OF</u>
	:	<u>LAUREN A. ISAACOFF</u>
CLIFFORD BRODY, LINDA EAGLE and	:	
DAVID SHAPP,	:	
Defendants.	:	
-----X		

I, LAUREN A. ISAACOFF, pursuant to 28 U.S.C. § 1746, declare under the penalty of perjury that the foregoing is true and correct:

1. I am an attorney duly admitted to practice in the courts of the State of New York and in the Southern District of New York and am an associate with the law firm of Buchanan Ingersoll & Rooney PC, attorneys of record for Plaintiffs-Counterclaim Defendants Sawabeh Information Services Company ("SISCOM" and Edcomm, Inc. ("Edcomm," and collectively, "Plaintiffs") herein. As such, I am fully familiar with the facts and circumstances herein. I respectfully make this Declaration in support of Plaintiffs' motion to dismiss Defendants' Seventh and Eighth Counterclaims¹ ("Plaintiffs' Motion").

2. Attached hereto as Exhibit 1 is a true and correct copy of the Notices of Charge of Discrimination from the U.S. Equal Employment Opportunity Commission ("EEOC") dated January 27, 2012, filed by Defendants against Edcomm.

¹ The Counterclaims contain two (2) counterclaims designated as the "Eighth." This Motion concerns the first "Eighth" Counterclaim. (See Exhibit 1 at paragraphs 335 to 367).

3. Attached hereto as Exhibit 2 is a true and correct copy a letter dated February 1, 2012 sent by Plaintiffs' counsel to Defendants' counsel demanding that Defendants withdraw their Seventh and Eighth Counterclaims.

4. Attached hereto as Exhibit 3 is a true and correct copy of Defendants' counsel's letter dated February 1, 2012 to Plaintiffs' counsel in response.

5. Pursuant to this Court's individual rules and procedures, I certify that pre-motion letters were exchanged between counsel for the parties in advance of the filing of the instant motion (these letters are not incorporated in Plaintiffs' Motion as Exhibits).

Executed on: New York, New York
February 2, 2012

/s/ Lauren A. Isaacoff
LAUREN A. ISAACOFF

BUCHANAN INGERSOLL & ROONEY PC

1290 Avenue of the Americas, 30th Floor
New York, New York 10104
Tel: (212) 440-4400
Fax: (212) 440-4401
lauren.isaacoff@bipc.com

*Attorneys for Plaintiffs-Counterclaim Defendants
Sawabeh Information Services Company
and Edcomm, Inc.*